



## **PRIVACY POLICY**

At LeasePlan we are committed to providing the best possible leasing and fleet management services for our customers. From time to time we require access to personal information in order to provide our services; in so doing we recognise the extreme importance of keeping this information confidential and maintaining strict guidelines on access to and use of such information.

## **A NEW PRIVACY FRAMEWORK**

A new Federal privacy framework regulating the way private sector organisations handle personal information came into force on 21 December 2001. The regulatory framework is contained in the Privacy Act 1988 and includes ten National Privacy Principles.

### **Some of the personal information we hold is exempted from this framework:**

The handling of employee personal information directly related to a current or former employment relationship between the employee and LeasePlan is exempt from the provisions of the Privacy Act, unless that information is to be provided to third parties.

Despite this exemption, we do protect the privacy of employee personal information. Further, some parts of the regulatory framework do not apply to personal information we collected before 21 December 2001. We will observe those parts of the framework that apply to such information and continue to apply our stringent privacy practices to safeguard the confidentiality of such information.

In particular, we will:

- Ensure that such information is up-to-date, accurate and complete;
- Ensure it is stored securely;
- Destroy it when it is no longer needed;
- Provide you with access to this information if we still use or disclose this information;
- Not use any government identifier to identify you; and
- Only transfer such information overseas in accordance with the criteria set out in this policy.

## **WHAT IS PERSONAL INFORMATION?**

Personal information is information or an opinion that can identify a person or by which your identity can be reasonably determined.

## **PROTECTING YOUR PRIVACY**

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business. As a fleet management service organisation, LeasePlan has a long history of handling confidential information. We treat very seriously the ongoing trust you have in us to protect your personal information. We have systems and procedures in place to protect your privacy whenever we collect, store, use or disclose your personal information. We also give you access to that personal information and a right to correct it where needed.

LeasePlan's Privacy Policy explains how we protect your privacy, including:

- The importance of your consent before we disclose your personal information to third parties;
- How we handle your sensitive information, such as health information;
- How we respect your privacy in the course of using your information; and
- How your privacy is protected when you access our websites via the Internet.



## **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect most information directly from you, and usually with your consent. For example, we may collect personal information when you complete a business application form, deal with us over the telephone, send us a letter or visit our website.

The type of personal information we collect may include your name and may include your mailing address, telephone number, email address, place of work, date of birth, annual income and other financial details where applicable. In some circumstances we may need to comply with Occupational Health and Safety requirements and therefore, we may also collect sensitive information such as health information.

There may be occasions when we need to source personal information about you from a third party. For example, we may collect:

- Details from your employer in the course of establishing and managing the company's fleet of vehicles; or
- A credit reference about you from a credit-reporting agency in the course of assessing a novated lease application.

## **HOW WE USE YOUR PERSONAL INFORMATION**

We only collect personal information about you that is necessary in the conduct of our fleet management operations and activities. We will tell you at the time we collect personal information the purposes for which we intend to use your personal information.

Collection of your personal information is essential for us to maintain and service your relationship with us. Without the information that we request you to provide to us, we would not be able to deal with you or provide you with our products and services.

### **We may use personal information for various purposes**

The primary purpose for LeasePlan collecting your personal information is usually to provide fleet management services to you or your employer.

We may also use or disclose your personal information for secondary purposes such as:

- Helping us to develop and identify related products and services that may interest you;
- Tell you about our products and services (unless you have asked us not to);
- Maintaining our relationship with you;
- Conducting market or customer satisfaction research;
- Performing our internal administration and operations including accounting, risk management, record keeping, archiving, systems development and testing, credit scoring and staff training;
- Compliance with legislative and regulatory requirements;
- Prevention and investigation of crime or fraud to protect your interest and our interest;
- Developing, establishing and administering alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services; and
- Managing our rights and obligations in relation to external payment systems.

We may contract out some of our functions and activities; for example, we may provide names and addresses to a mailing house to enable us to distribute information to you about your vehicle. In these situations, we prohibit third parties from using your personal information except for the specific purpose for which we supply it.

### **Do we use your tax file number or other government identifier?**



We do not use your tax file number (TFN), Medicare number or any other government agency identifier as our customer identifier.

#### **WHAT ABOUT SENSITIVE INFORMATION?**

Sensitive information can include any information about your health, your racial or ethnic origin, your political or religious beliefs, your sexual preference, your professional memberships, and if relevant, your criminal record. Unless collection is required by law, we obtain your consent before we collect sensitive information about you. We will only use sensitive information, such as your health information, for the primary purpose of collection and any other purposes directly and closely related to the primary purpose: for example, health information gathered for

Occupational Health and Safety purposes on drivers of plant and equipment. If we use your sensitive information for any other purposes, we will always obtain your prior consent.

#### **OUR DUTY OF CONFIDENTIALITY**

We have a duty to keep confidential all personal information we hold about our customers.

Our duty of confidentiality applies except where disclosure of a customer's personal information is:

##### **Compelled by law**

For example, disclosure to various Government departments and agencies such as the Australian Taxation Office, traffic authorities and disclosure to courts under subpoena.

##### **In the public interest**

For example, where a crime, fraud or misdeed is committed or is suspected, and disclosure against the customer's rights of secrecy is justified.

##### **In LeasePlan's interest**

For example, disclosure to a court in the event of legal action to which LeasePlan is a party; or necessary disclosures in connection with the sale of any assets.

##### **With the customer's consent.**

#### **Your consent is important**

Your personal information is usually used or disclosed only after obtaining your consent. Your consent can be express or implied. Your express consent can be verbal or written; for example when you sign an application for a novated lease you are giving your express consent for us to obtain a credit reference about you from a credit-reporting agency. You imply consent when we can reasonably conclude that you have given consent by some action you take, or when you decide not to take action. For example, if you use our telephone service and *continue* the call after hearing the recorded message telling you that the call may be monitored or recorded for training purposes, you have given us your implied consent to monitor or record your call.

We rely on your implied consent to use and disclose identifying information about you, such as disclosing your name to LeasePlan's service providers. Naturally, we require such third parties to also comply with our Privacy Policy. The confidentiality of your personal information is still maintained on our behalf. If you do not consent to certain uses of personal information, we may not be able to deal with you or provide you with a particular product or service.



### **SHARING PERSONAL INFORMATION WITHIN LEASEPLAN**

Subject to other exceptions under our duty of confidentiality, we only share your personal information within LeasePlan with your express or implied consent.

### **DISCLOSING TO THIRD PARTIES**

Subject to other exceptions under our duty of confidentiality, we only disclose your personal information to third parties with your express or implied consent.

The types of third parties to whom we may disclose personal information may include:

- Our insurance claims managers/administrators;
- Our dealers where a vehicle is required to be registered in your name;
- State based authorities, such as Road Traffic Authorities

LeasePlan does not disclose names and addresses to third parties for the purposes of allowing them to direct market their products and services.

### **DIRECT MARKETING AND PRIVACY**

Serving our customers well is fundamental to our business. As part of this we may use personal information we have collected to identify products and services, which may benefit you. We may contact you from time to time to let you know about new or existing products or services, which may be of interest to you.

If you do not wish to receive direct marketing information, you can tell us at any time: we will give you the option not to receive our direct marketing material both at the time of first contact and at any time afterwards. Having been requested not to send you such marketing material, we will use our best efforts to ensure such activity ceases at our earliest opportunity.

### **WE KEEP YOUR PERSONAL INFORMATION UP-TO-DATE**

If we have accurate information about you, it enables us to provide you with the best possible service. We take reasonable steps to ensure that your information is accurate, complete and up-to-date at the time of collecting, using or disclosing your personal information. If we consider it necessary, we will check the accuracy of your information before using or disclosing your information.

### **We will correct personal information**

We will also promptly update any personal information that is inaccurate, incomplete or out-of-date. If you find that current personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will correct it. You have the right to request that a statement be attached to your personal information if we disagree with your request to correct the information. There is no charge for correcting your personal information.

### **YOU CAN ACCESS YOUR PERSONAL INFORMATION**

You can access the personal information we hold about you, subject to some exceptions (see below).

### **How to request access**

You should contact the person, or department that you normally deal with to request access. We will need to establish your identity before giving you access but we will respond to your request as soon as possible. If the person, or department that you normally deal with cannot



respond to your request at the time of your request, then we may require you to put your request for access in writing. If you have made a written request for access we can usually deal with straightforward requests within 14 to 30 days. If your request is more complex, it may take a bit longer.

LeasePlan reserves the right to charge a small fee to recover our costs of providing access to all your personal information.

### **We may not be able to give you access when...**

We may not be able to give you access to your information in certain circumstances including:

- If it will threaten the privacy of other individuals;
- If the information relates to anticipated legal proceedings;
- If the information would reveal our commercially sensitive decision making process;
- If the law prevents us from disclosing the information.

If we are unable to give you access, we will give you reasons why and, wherever possible, attempt to find alternative means to enable you to access your information.

### **WE STORE YOUR PERSONAL INFORMATION SECURELY**

We will protect any personal information that we hold from misuse and loss. We will also protect it from unauthorised access, modification and disclosure.

### **We protect your information**

Only authorised users are able to access your personal information, and only for approved purposes. Your information may be stored in hardcopy documents or as electronic data. We maintain physical security over our paper and electronic data stores and premises, such as locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems.

### **LeasePlan's Security Policy**

We have comprehensive security policies and procedures documented in our internal security policy. Your personal information will be recorded, amended or deleted only by authorised means. In addition, all employees sign confidentiality agreements as a condition of working for LeasePlan and these are reissued annually.

### **We will destroy or de-identify personal information no longer required**

We will either destroy or remove information that identifies you, from our records when we no longer need your personal information for the purposes we collected it for, or for the purposes of meeting legal requirements. We will shred all paper files, letters, correspondence and any other hardcopy documents that contain personal information that is no longer needed.

All information stored in electronic form will be permanently deleted or de-identified from all systems, including any back-up files. Our processes for disposing of computer hardware also ensures that such personal information is deleted before such equipment is offered for sale.

### **WEB SITE SECURITY AND YOUR PRIVACY**

The Internet has rapidly changed the way we do business – it allows LeasePlan to provide services that you can access from the comfort and convenience of your own home or office.



We also understand that you may be concerned about the confidentiality and security of the information we may collect about you online. Accordingly, we have systems in place to ensure our online dealings with you are as secure and confidential as your dealings with us in person, or on the telephone.

#### **Information collected on-line**

The LeasePlan web site relies on "cookies" to provide a number of services to you. "Cookies" are small pieces of information that are stored by your browser on your computer's hard drive. This web site only uses **session cookies** and only during a search query of the web site. Our cookies do not contain any personally identifying information, but they do enable us to recognise you as a frequent visitor, and we can tailor the information we send down the line to suit your preferences. We may also avoid the need to ask you for all your personal details all over again. The goal is to make your visit to the site easier, faster, and more productive for you.

Most web browsers automatically accept cookies, but you can usually change your browser to prevent that.

#### **How does LeasePlan protect customer information?**

When you place orders or access your account information, we offer the use of a secure server. The secure server software (SSL) encrypts all information you input before it is sent to us. Furthermore, all of the customer data we collect is protected against unauthorised access.

Our site has security measures in place to protect the loss, misuse and alteration of the information under our control. Such security measures include firewalls and passwords. While it is never possible to protect a site 100%, we will do our best to make sure your browsing experience is safe and will correct any problems as soon as possible.

#### **OUR PRIVACY POLICY MAY CHANGE FROM TIME TO TIME**

LeasePlan regularly reviews all its policies and procedures to keep up-to-date with changes in the law, technology and market practice. As a result we may change this policy from time to time. The Privacy Policy was created on 13 December 2001.

#### **RESOLVING YOUR CONCERNS**

##### **We respond quickly to complaints**

If you believe that the privacy of your personal information has been compromised, you are entitled to complain. We will respond to your complaint as soon as possible but usually within two working days, to let you know who is responsible for managing your complaint. We will try to resolve the complaint within ten working days. When this is not possible, we will contact you within that time to let you know how long it will take to resolve the complaint.

##### **How to make a complaint**

If you have a privacy complaint, contact the person, or department that you have been dealing with. We will take responsibility for your complaint at the point where the problem occurs. If your complaint is not resolved to your satisfaction, you can make contact:

By telephoning 03 9269 2399  
By writing to The Privacy Officer  
LeasePlan Australia Limited  
PO Box 6297, St Kilda Road Central  
Melbourne VIC 3004



Our Privacy Officer will objectively and impartially investigate your complaint if you are dissatisfied with our internal complaints process. If your privacy complaint is still not satisfactorily resolved, you may apply to the Federal Privacy Commissioner to have your concern heard and determined. For more information about how you may lodge a complaint with the Federal Privacy Commissioner, please contact the Commissioner's hotline service on 1300 363 992.

**NEED MORE INFORMATION**

If you have a query on how your personal information is collected or used, or any other query relating to LeasePlan's Privacy Policy, call the Customer Service Centre on 13 25 72, 8.30am to 5.30pm EST, Monday to Friday.